IN UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI NORTHERN DIVISION

ARTHUR DOE, et al.

PLAINTIFFS

VS. CAUSE NO: 3:16-ev-789

JIM HOOD, Attorney General of the State Of Mississippi, et al.

DEFENDANTS

UNOPPOSED MOTION TO AMEND/CORRECT PROTECTIVE ORDER

COME NOW Defendants, sued in their official capacities only, and submit this Unopposed Motion to Amend/Correct Protective Order as follows, to-wit:

- 1. Today the Court entered a Protective Order [Doc. 53] that includes a list of individuals, to whom Confidential Information may be disclosed.
- 2. Jay Eads, identified in paragraph 5(c), has left his position with the Mississippi Department of Public Safety since the proposed protective order was submitted by the parties.
- 3. Anthony Schmidt, General Counsel for the Mississippi Department of Public Safety, will assume Mr. Eads' role in connection with this litigation.
- 4. Therefore, in order to permit discovery to proceed efficiently and expeditiously, Anthony Schmidt should be substituted for Jay Eads in paragraph 5(c) as an individual to whom Confidential Information may be disclosed.
- 5. Plaintiffs' counsel has been consulted and has confirmed that Plaintiffs do not oppose this Motion.

WHEREFORE, Defendants respectfully request that the Court enter an order providing that Anthony Schmidt shall be substituted for Jay Eads as a person to whom Confidential Information may be disclosed, and that in all other respects the Protective Order shall remain unmodified.

Respectfully submitted this the 20th day of September, 2017.

JIM HOOD, Attorney General of the
State of Mississippi; ALBERT SANTA CRUZ,
Commissioner of the Mississippi Department of
Public Safety; CHARLIE HILL, Director of the
Mississippi Sex Offender Registry; COLONEL
CHRIS GILLARD, Chief of the Mississippi
Highway Patrol; and LIEUTENANT COLONEL
LARRY WAGGONER, Director of the Mississippi
Bureau of Investigation

By: <u>s/Paul Barnes</u>

PAUL E. BARNES, MSB No. 99107 WILSON MINOR, MSB No. 102663 Special Assistant Attorneys General STATE OF MISSISSIPPI OFFICE OF THE ATTORNEY GENERAL Post Office Box 220 Jackson, MS 39205 Telephone No. (601)359-4072 Facsimile: (601)359-2003 pbarn@ago.state.ms.us

wmino@ago.state.ms.us

CERTIFICATE OF SERVICE

This is to certify that on this day I, Paul E. Barnes, Special Assistant Attorney General for the State of Mississippi, electronically filed the foregoing document with the Clerk of the Court using the ECF system which sent notice of such filing to the following:

Robert B. McDuff MCDUFF & BYRD 767 North Congress Street Jackson, MS 39202 rbm@McDuffLaw.com

Jacob W. Howard MCDUFF & BYRD 767 N. Congress Jackson, MS 39202 jake@McDufflaw.com

Alexis Agathocleous - PHV CENTER FOR CONSTITUTIONAL RIGHTS 666 Broadway, 7th Floor New York, NY 10012 aagathocleous@ccrjustice.org

Ghita Schwarz - PHV CENTER FOR CONSTITUTIONAL RIGHTS 666 Broadway, 7th Floor New York, NY 10012 gschwarz@ccrjustice.org

ATTORNEYS FOR PLAINTIFFS

Elliot Tarloff - PHV JENNER & BLOCK, LLP - Washington, DC 1099 New York Avenue, N.W., Suite 900 Washington, DC 20010-4412 etarloff@jenner.com

Lindsay Harrison - PHV JENNER & BLOCK, LLP - Washington, DC 1099 New York Avenue, N.W., Suite 900 Washington, DC 20010-4412 lharrison@jenner.com Oliver E. Diaz , Jr.
OLIVER DIAZ LAW FIRM
P. O. Box 946
Madison, MS 39031
oliver@oliverdiazlaw.com

ATTORNEYS FOR AMICI CURIAE

THIS, the 20h day of September, 2017.

s/Paul Barnes
PAUL E. BARNES